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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
37509 NORTH WEST BRANCH ROAD,  
DEER PARK, WASHINGTON,  
TOGETHER WITH ALL  
APPURTENANCES, FIXTURES,  
ATTACHMENTS, AND  
IMPROVEMENTS THERETO AND  
THEREUPON,  
Defendant.

CV-08-346-RHW

## Joint Status Conference Certificate and Proposed Discovery Plan

Plaintiff, United States of America, by and through James A. McDevitt, United States Attorney for the Eastern District of Washington and Shawn N. Anderson, Assistant United States Attorney; and, Claimant, Robert Casados, by and through his attorney, Kailey Moran, submit the following status conference certificate and proposed discovery plan in compliance with the order of this court and Rules 26(a)(1) and (f) of the Fed. R. Civ. P.

(1) Service of Process on Parties: The parties agree that Notice and Service of Process is complete.

1       (2) Jurisdiction and Venue: The parties agree that jurisdiction and venue are  
2 proper within the above court.

3       (3) Anticipated motions: The government intends to file a motion for  
4 summary judgement upon completion of discovery, no later than August 7, 2009.

5       (4) The parties propose the following discovery plan:

6       Plaintiff, United States, and Claimants will exchange the following information  
7 pursuant to Rule 26 of the Fed. R. Civ. P. on or before April 17, 2009.

8           (a) A listing of the names, addresses and telephone numbers of each  
9 individual likely to have discoverable information; and,

10           (b) copies of all documents, data compilations and tangible things that  
11 are relevant to the disputed facts herein.

12       The parties will conduct further discovery, with a proposed discovery cutoff  
13 date of July 17, 2009.

14       (5) Recommended Dates for Pretrial Conference and Trial, and length of  
15 trial: The parties agree to a pretrial conference the week of October 26, 2009, and trial  
16 to begin the week of November 9, 2009. The trial should last no longer than three  
17 days.

18       (6) Appropriateness of Special Procedures such as Consolidation of Actions:  
19 The parties are unaware of the necessity for special procedures at this time.

20       (7) Modification of the standard pre-trial procedures: The parties do not  
21 believe that modification or deviation is necessary in this matter.

22       (8) Structuring of the Trial: Not applicable.

23       (9) Prospects for Settlement: The United States and Claimant, Robert  
24 Casados, will engage in additional discussions regarding possible settlement.

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1 (10) Any other Matters Conducive to Just, Efficient, and Economical  
2 Determination of the Action: The parties are unaware of any course of action which  
3 would fit the above criteria with respect to the instant matter.

4 DATED this 13<sup>th</sup> day of March, 2009.

5 James A. McDevitt  
6 United States Attorney

7 s/Shawn N. Anderson

8 Shawn N. Anderson  
9 Assistant United States Attorney

10 *Approved via email*

11 Kailey Moran  
12 Attorney for Claimant  
Robert Casados